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SAN FRANCISCO DIVISION**

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In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**REPLY IN SUPPORT OF *EX PARTE*
APPLICATION FOR ORDER
AUTHORIZING REORGANIZED DEBTORS
TO EXCEED THE 250 CLAIM PER
OMNIBUS OBJECTION LIMIT**

[No hearing requested]

1 PG&E hereby submits this reply in support of its *Ex Parte* Application for an order lifting
2 the 250-claim limit for an omnibus objection (the “**Application**”). ECF No. 14652.¹

3 **I. ARGUMENT**

4 The RKS Claimants have no real objection to the relief PG&E seeks in the Application,
5 which is an administrative request to file one omnibus objection to the 474 claims asserted by the
6 approximately 54 remaining RKS Claimants instead of pointlessly filing two identical objections,
7 each directed to 250 or fewer of those claims.

8 The RKS Claimants’ Opposition, ECF No. 14656, ignores this administrative relief entirely
9 and instead argues that PG&E’s Supplemental Omnibus Objection is procedurally improper. On
10 that basis alone, the Application should be granted. The RKS Claimants’ argument is not only
11 misplaced—it has nothing to do with the relief sought in the Application (whether PG&E has to
12 file two identical objections instead of one)—it is also asking the Court to adopt a position that
13 would vitiate PG&E’s due process rights and render meaningless the last year of motion practice
14 regarding whether the RKS Claimants failed to state a claim. In substance, the RKS Claimants’
15 position is that the Court granted the RKS Claimants carte blanche to amend the RKS Amendment
16 in any way they deem fit—*i.e.*, to add allegations, claims, or in this case, add back in three
17 corrective disclosures and stock drops that the Court already dismissed—without PG&E having
18 any recourse to challenge whether these new allegations fail still to state a claim. In other words,
19 the past year of briefing would have been a complete waste of the Parties’ and the Court’s time and
20 effort because the RKS Claimants could plead anything to resuscitate their claims, and PG&E (and
21 the Court) would be powerless to challenge those amended claims.

22 Of course, the RKS Claimants’ backwards interpretation of the Court’s Order is a self-
23 serving maneuver to deprive PG&E of its right to challenge the RKS SAC’s amended allegations.
24 Importantly, and consistent with the Court’s Order, PG&E’s Supplemental Omnibus Objection was
25 aimed only at the RKS Claimants’ new allegations; PG&E does not seek to “renew” or re-litigate
26 any of the arguments it previously made. *See* Order at 3 (noting that the Court would not consider

27 ¹ Defined terms not defined herein have the meaning ascribed to them in the Application and in
28 PG&E’s Supplemental Omnibus Objection, ECF No. 14649.

1 “renewed attempts by PG&E to dismiss” the allegations in the RKS Amendment) (emphasis
2 added).

3 Finally, allowing PG&E to file its Supplemental Omnibus Objection has absolutely no
4 impact on the case schedule or discovery, which was the Court’s main concern in its Order. Order
5 at 3. If anything, sustaining PG&E’s Supplemental Omnibus Objection will streamline discovery
6 to focus only on the alleged corrective disclosures and stock drops that the Court deems sufficiently
7 pled.

8 II. CONCLUSION

9 The RKS Claimants’ Opposition is procedurally improper and substantively wrong. The
10 Application should be granted.

11 Dated: November 22, 2024

12 **WEIL, GOTSHAL & MANGES LLP**
13 **LATHAM & WATKINS LLP**
14 **KELLER BENVENUTTI KIM LLP**

15 By: /s/ Michael J. Reiss
16 Michael J. Reiss

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